REMARKS/ARGUMENTS

No claims have been cancelled. No claims have been added or amended. Claims 1-21 represent the set of claims currently pending in this Application. Responsive to the Final Office Action dated 10/23/2003, Applicant has presented arguments below that Applicant believes should render the claims allowable. In the event, however, that the Examiner is not persuaded by Applicant's arguments, Applicant respectfully requests that the Examiner enter these remarks to clarify issues upon appeal. Reexamination and reconsideration of the Application in view of the following arguments, are respectfully requested.

Applicant's agent expresses gratitude to the Examiner for conducting an interview on November 19, 2003, during which time Applicant's agent presented a summary of the cited prior art and explained why these references were fundamentally different than Applicant's invention. The Examiner requested that these explanations and arguments be repeated in writing for reconsideration by the Examiner, in view of these fundamental differences. In accordance with the Examiner's instructions, these explanations and arguments are included in the remarks that follow.

Office Action Rejection under 35 USC § 103(a)

The Examiner rejected claims 1-21 as being unpatentable over Blumer et al. (US Patent number 6,189,019, hereinafter "Blumer") in view of Astiz et al (U.S. Patent No. 6,035,330, hereinafter "Astiz"). Applicant respectfully traverses these rejections for the reasons set forth below.

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Brief Summary of the Astiz Reference

Astiz describes the generation of a navigational map representing an already existing set of linked files. A typical example of an environment wherein Astiz may be practiced is a web site comprising a plurality of previously linked web pages. Astiz analyzes this structure and creates a navigational map in the form of a hierarchy of web pages, to be displayed to the user for navigational purposes.

Astiz uses an analogy that is helpful in understanding the nature of the Astiz invention, found in column 5, lines 39–57. Astiz states that his invention is like a road map. Without the roadmap, the driver must actually drive the roads and read the signs along the way in order to navigate. Of course, it is obvious that this type of navigation has many problems. The driver may not travel in the most efficient manner – taking a roundabout way to reach her destination. Also, the driver may miss destinations simply because she didn't know that they were nearby. With the aid of a roadmap, the driver may plan her trip for efficiency and completeness, prior to the start of the trip.

Continuing to use this analogy, it is important to understand that Astiz pertains to building the roadmap; however, the roads must already exist for Astiz to be practiced, wherein Astiz analyzes the network of roads and conveniently represents these pre-existing relationships in the form of a roadmap for the benefit of a traveler. Under no circumstances does Astiz build roads.

Brief Summary of The Blumer Reference

Blumer is very similar to Astiz in that Blumer also teaches a navigational aid that represents a website as either an "outline view" or as a "link map view". The outline view represents the previously existing linked web pages in a hierarchical list form. The link map view represents this same information in the form of icons representing web pages with arrows representing the links (relationships) between the web pages.

Once again, borrowing the convenient roadmap analogy developed by Astiz, Blumer is creating a roadmap for use as a navigational aid from an already existing network of roads. Blumer is not creating the roads.

Summary of Applicant's Invention

Applicant's invention, as recited in independent claims 1, 8 and 15, is directed to a link management system that links units of information together based upon a list of identifiers that have been stored in a predetermined relative hierarchical order, the identifiers identifying the units of information. "Units of information" is defined within the specification as including a collection of web pages or a collection of help files that are inter-linked by URL links (see page 1, lines 11-16).

Continuing to borrow from the Astiz roadmap analogy, we see that Applicant's invention builds roads, and has absolutely nothing to do with building navigational maps from existing roads.

Applicant's agent, during the interview, used the roadmap analogy to illustrate the value of Applicant's invention with a specific example. The example used was three cities, San Francisco, Palo Alto, and San Jose starting out with no interconnecting roads

(the cities are used to represent web pages, and the roads represent web page links). By providing the link manager with a simple hierarchical list comprising San Francisco at the highest level, followed by San Jose and Palo Alto at the second level, the link manager can build a set of roads between these cities.

Following Applicant's teaching, the link manager for this example would link San Francisco to San Jose, San Jose to San Francisco, San Francisco to Palo Alto, Palo Alto to San Francisco, San Jose to Palo Alto and Palo Alto to San Jose. Basically, using the above hierarchy, the present invention teaches that the parent points to each child, each child points to the parent, and each child is forward and backward chained for each level. This set of rules can be observed in Figure 5a and 5b of Applicant's specification. The above example illustrates that six links are established with just a simple hierarchical list of three entities. It is apparent, with websites comprising hundreds of pages, that the use of Applicant's invention will have an even more dramatic effect on ease of use for an informational developer linking or re-linking web pages.

The Applicant's Claimed Invention Is Patentable Over the References

Claims 1, 8 and 15

The Examiner rejected independent claims 1, 8, and 15 as being unpatentable over Blumer in view of Astiz. The Examiner acknowledges that Blumer does not teach a crucial element of Applicant's invention comprising "wherein said list of identifiers has a predetermined relative hierarchical order to direct said link management system in the creation of said links." The Examiner asserts, however, that in view of Astiz it would have been obvious to modify Blumer to include this missing element.

Applicant disagrees with the Examiner's conclusion. Nowhere within Astiz, or Blumer, is there any teaching or suggestion to create links in web pages in accordance with a hierarchical list of identifiers. To the contrary, the teachings within both Blumer and Astiz pertain only to creating navigational aides, which may comprise hierarchical lists of IDs, from a set of web pages that are already linked together. Applicant has reviewed all of the Examiner's citations, as well as the referenced patents in their entirety, and they are completely void of any teaching or suggestion to create links in web pages from a hierarchical list, or from any other form of a navigational map. Furthermore, it would be far from a reasonable expectation that one of ordinary skill in the art could conceive of the notion of creating links in web pages from a hierarchical list when the primary thrust of the teachings is to create a navigational aid from a set of already linked web pages.

The Examiner further states "It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified <u>Blumer et al.</u> by the teaching of <u>Astiz et al.</u> to include wherein said list of identifiers has a predetermined relative hierarchical order to direct said link management system in the creation of said links because creating a hierarchical map for inserting and storing existing and new links provides for efficient and faster data access and navigation." Applicant disagrees with this assertion. Applicant's invention has nothing to do with "efficient and faster data access and navigation". Applicant's invention enables an information developer to improve ease-of-use and time efficiency in creating links in web pages to link together a plurality of web pages in accordance with the information developers plan. (See page 4, lines 14-19). Ease of use and time efficiency for an information developer is the

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primary motivation for Applicant's invention and "efficient and faster data access" is,

therefore, a non-motivating factor. Applicant's invention addresses the problems in the

prior art of using editors to manually create links between web pages, and/or learning

new programming languages to provide individual instructions to create each and every

link within the website.

not claimed

Claims 2-7, 9-14 and 16-21

Since claims 2-7, 9-14 and 16-21 are respectively dependent, directly or

indirectly, on claims 1, 8 and 15, the above articulated arguments related to claims 1, 8

and 15 apply with equal force to claims 2-7, 9-14 and 16-21. Accordingly, claims 2-7, 9-

14, and 16-21 are respectfully asserted to be allowable over the cited references.

Conclusion

In view of the tutorial information presented to the Examiner during the course of

the interview of 11/19/2003, and in view of the arguments presented herein,

reconsideration and allowance of this Application are now believed to be in order, and

such actions are hereby solicited. If the Examiner believes, for any reason, that personal

communication will expedite prosecution of this Application, the Examiner is invited to

telephone the undersigned at the number provided.

Respectfully submitted,

By: _____

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